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Attorneys for Defendants
 SHARP CORPORATION and
 SHARP ELECTRONICS CORPORATION

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

IN RE: TFT-LCD (FLAT PANEL)
 ANTITRUST LITIGATION

Master File No. 3:07-md-1827 SI
 MDL No. 1827

This Document Relates To:
 ALL ACTIONS

**STIPULATION AND [PROPOSED]
 ORDER REGARDING SHARP
 WITNESS DEPOSITIONS**

The Direct Action Plaintiffs (“DAPs”) and Defendants Sharp Corporation and Sharp Electronics Corporation (collectively, “Sharp”) hereby stipulate as follows:

STIPULATION

WHEREAS the Special Master’s Order Regarding Individual Action Plaintiffs and Case Management, Dkt. No. 1727, approved by the Court on April 30, 2010, provides that a presumptive maximum of 12 fact witness depositions shall be taken for any single defendant group;

WHEREAS to date the depositions of 11 Sharp fact witnesses have been taken;

1 WHEREAS discovery in the class cases closed on May 11, 2011, while discovery in
2 the DAP cases is on-going;

3 WHEREAS the DAPs and Sharp have met and conferred regarding scheduling of
4 additional fact witness depositions, and the DAPs have requested several additional Sharp
5 fact witness depositions;

6 WHEREAS the DAPs and Sharp agree to expand the limit of Sharp fact witness
7 depositions to allow certain depositions beyond the presumptive limit of 12 to go forward,
8 with the understanding that no further depositions of Sharp will be taken absent the
9 exceptional circumstances described in paragraph 3 below;

10 NOW, THEREFORE, the DAPs and Sharp, through their undersigned respective
11 counsel, stipulate and request that the Court order as follows:

12 1. The DAPs may take the depositions of the following additional Sharp fact
13 witnesses: Mr. Qais Sharif; Mr. Hiroyuki Funabashi; Mr. Tetsuroh Muramatsu; Mr. Seiji
14 Nakagawa; and Mr. Akihiko Imaya.

15 2. Unless the parties agree otherwise, the depositions of Mr. Muramatsu and Mr.
16 Imaya will take place at a location in Asia to be determined.

17 3. None of the DAPs will be entitled to any additional fact witness depositions of
18 Sharp unless new, noncumulative, and important evidence that is not currently available
19 comes to light demonstrating that additional fact witness depositions are necessary to the
20 DAPs' cases. Except as set forth in Paragraph 4 below, this is the only basis on which any
21 of the DAPs may seek additional fact witness depositions of Sharp, and Sharp reserves the
22 right to oppose any such request for additional depositions. Nothing about this agreement
23 affects expert witness depositions or 30(b)(6) depositions.

24 4. The parties will separately address the issue of depositions of individuals who
25 submit declarations or are expected to be called as witnesses at trial and who have not
26 otherwise been deposed and nothing in this stipulation prejudices the rights of any party to
27 request the depositions of such individuals.

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5. To the extent 12 fact witness depositions of any DAP are taken and defendants believe that additional fact witness depositions are necessary, the DAPs agree to work with defendants in good faith to address defendants' requests for additional depositions.

Dated: September 7, 2011.

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By: /s/ Jerome A. Murphy
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Liaison Counsel for Direct Action Plaintiffs

SO ORDERED:



The Honorable Susan Illston
District Court Judge

9/7/11

Date Entered

ATTESTATION: Pursuant to General Order 45, Part X-B, the filer attests that
concurrence in the filing of this document has been obtained from Jerome A. Murphy.

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